

**MOSKOWITZ COLSON  
GINSBERG SCHULMAN**

Moskowitz Colson  
Ginsberg & Schulman LLP  
80 Broad Street, Suite 1900  
New York, NY 10004  
(212) 257-6455  
www.mcgsllp.com

November 14, 2024


**By ECF**

Hon. Ronnie Abrams  
U.S. District Judge  
U.S. Courthouse  
40 Centre Street  
New York, N.Y. 10007

Application granted.

SO ORDERED.

Re: U.S. v. Hugh Dunkerley  
16 Cr. 371 (RA)

  
Ronnie Abrams, U.S.D.J.  
November 18, 2024

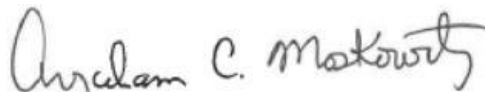
Dear Judge Abrams:

This letter is respectfully submitted on behalf of the defendant, Hugh Dunkerley, to request that the Court exonerate his bond and order the Clerk of the Court to remit the cash bail posted by Mr. Dunkerley to my firm's escrow account so that the money can be used to pay back taxes that Mr. Dunkerley owes the federal government.

As Your Honor may recall, I was appointed to represent Mr. Dunkerley for purposes of sentencing, taking the case over from Joseph Grob. At the time of my appointment, I spoke with Mr. Grob who advised me that Mr. Dunkerley had posted cash bail of \$100,000 that, upon completion of the case, was going to be used to pay off his federal tax obligations. Mr. Grob had retained a former IRS agent to calculate the amount of taxes Mr. Dunkerley owes and to negotiate a resolution with the IRS. Understandably, the IRS is awaiting release of the cash bail before reaching a final settlement with Mr. Dunkerley. Accordingly, it is respectfully requested that the Court exonerate Mr. Dunkerley's bond and direct the Clerk of the Court to remit the cash bail to my firm's escrow account where it will be used for the sole purpose of paying any settlement reached with the IRS. In the unlikely even that any money is left over after the payment of Mr. Dunkerley's back taxes, that money will be used to pay part of Mr. Dunkerley's forfeiture or restitution obligations.

Thank you for your consideration of this request.

Respectfully submitted,



Avraham C. Moskowitz

cc: AUSA Negar Tekeei (by email)

